IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE NASHVILLE DIVISION

SVERRE ERIKSEN and JARED MIRABAL, individually and on behalf of all others similarly situated,)))
Plaintiffs,)))
v.) Case No. 3:24-cv-00197-WLC-BDH
CORECIVIC OF TENNESSEE, LLC,))
Defendant.)

JOINT STATUS REPORT

Defendant CoreCivic of Tennessee, LLC ("Defendant") and Plaintiffs Sverre Eriksen and Jared Mirabal ("Plaintiffs"), by undersigned counsel, pursuant to the Court's January 14, 2025 Order (ECF No. 48) and the Parties' April 14, 2025 Joint Status Report (ECF No. 52), hereby jointly provide the Court a status report.

- 1. By way of brief background, after diligent and collaborative work between the Parties, the Parties requested, and the Court granted, numerous extensions of time for the Parties to mediate the claims at issue in not just the operative Complaint, but also additional claims Plaintiffs raised throughout the process of preparing for mediation. (*See generally ECF No. 47*).
- 2. Specifically, in addition to the claims set forth in the operative Complaint, the Parties also agreed to mediate additional prospective wage and hour claims arising in Defendant's Florida and Kentucky facilities ("Florida claim" and "Kentucky claim", respectively). (*Id.* at ¶¶ 5-6, 9-10).

- 3. On April 10, 2025, the Parties attended the mediation in good faith with experienced mediator Dennis Clifford.
- 4. The Parties were unable to fully resolve the claims at issue. However, the Parties were successful in resolving the Florida claim.
- 5. On April 14, 2024, pursuant to the Court's January 14, 2025, Order (ECF No. 48), the Parties filed a joint status report indicating that they were diligently working to prepare a joint motion to reopen the case and propose a reset of the initial case management conference, along with proposed scheduling for the litigation in addition to continuing informal discussions regarding the remaining claims. (*See* ECF No. 52).
- 6. Since then, the Parties have continued informal settlement negotiations and respectfully request additional time to fully exhaust their settlement negotiation efforts before moving to reopen the case and propose a reset of the initial case management conference, along with proposed scheduling for the litigation.
- 7. The Parties anticipate concluding their settlement negotiations within fourteen (14) days of the filing of the instant status report. In the event settlement negotiations are unsuccessful, the Parties anticipate filing their contemplated joint motion to reopen the case at the conclusion of the requested fourteen (14) day period. In the event settlement negotiations are successful, the Parties will provide the Court with a status update regarding the same and estimate of time needed to formalize the agreement for the Court's approval.

Respectfully submitted,

/s/ Camille Fundora Rodriguez

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Date: April 28, 2025

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